



Office of the Attorney General  
State of Texas

DAN MORALES  
ATTORNEY GENERAL

October 18, 1996

Mr. Thomas L. Cox, Jr.  
Director, Legal Services  
Parkland Memorial Hospital  
6300 Harry Hines Blvd., Suite 301  
Dallas, Texas 75235

OR96-1885

Dear Mr. Cox:

On behalf of the Dallas County Hospital District (the "district"), you ask whether certain information is subject to required public disclosure under chapter 552 of the Government Code. Your request was assigned ID# 101243.

The district received a request for certain information pertaining to the proposed integration of four local hospitals. You assert that one memorandum is excepted from required public disclosure under section 552.111 of the Government Code.<sup>1</sup>

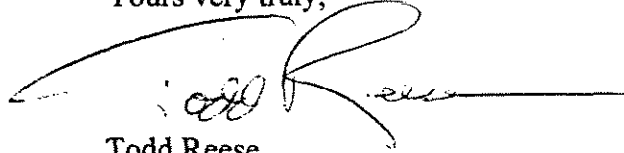
Section 552.111 excepts "[a]n interagency or intraagency memorandum or letter that would not be available by law to a party in litigation with the agency." In Open Records Decision No. 615 (1993), this office concluded that section 552.111 excepts from required public disclosure only those internal communications consisting of advice, recommendations, opinions, and other material reflecting the policymaking processes of the governmental body. An agency's policymaking functions, however, do not encompass internal administrative or personnel matters; disclosure of information relating to such matters will not inhibit free discussion among agency personnel as to policy issues. *Id.* at 5. In addition, section 552.111 does not except from disclosure purely factual information that is severable from the opinion portions of internal memoranda. *Id.* We have examined the document at issue and conclude that the portion we have marked consists of advice, recommendation, opinion, or other material reflecting the policymaking processes of the governmental body and, consequently, may be withheld under section 552.111 of the Government Code.

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<sup>1</sup>As you raise no exception to any other information, we assume that all other information responsive to this request has been or will be released to the requestor.

We are resolving this matter with an informal letter ruling rather than with a published open records decision. This ruling is limited to the particular records at issue under the facts presented to us in this request and may not be relied upon as a previous determination regarding any other records. If you have questions about this ruling, please contact our office.

Yours very truly,

A handwritten signature in black ink, appearing to read 'Todd Reese', with a long horizontal flourish extending to the right.

Todd Reese  
Assistant Attorney General  
Open Records Division

RTR/rho

Ref.: ID# 101243

Enclosures: Marked document

cc: Mr. Kenneth Stretcher  
3832 Mount Pleasant  
Dallas, Texas 75211  
(w/o enclosures)